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December 11, 2023

VIA ECF

Honorable Cheryl L. Pollak
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Kociubinski v. NYC Health and Hospital Corp.,
22 Civ. 2865 (ENV)(CLP)

Dear Judge Pollak:

I am the Assistant Corporation Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, assigned to represent defendant New York City Health and Hospitals Corporation (“H+H”) in the above-referenced case. I write on behalf of the parties to provide the Court with a status report per the Court’s November 1, 2023 Order.

The parties are still in the process of scheduling depositions in the above-referenced matter. Due to professional obligations, and scheduling conflicts necessitated by the upcoming Christmas and New Years Holidays, the parties anticipate being in a position to complete deposition on or before January 31, 2024.¹

The parties respectfully ask that they be permitted to file a joint status letter with the Court on February 2, 2024 to apprise the Court on the status of the case.

We appreciate the Court’s attention and consideration of this request.

¹ It bears noting for the Court that the undersigned anticipates commencing parental leave on or around January 22, 2024 and that, while on the leave, the case will be reassigned to another Assistant Corporation Counsel.

Respectfully submitted,

/s/

Kerrin A. Bowers

Assistant Corporation Counsel

cc: Jason Mizrahi, Attorney for Plaintiff